

WNI 18-023404  
Shapiro & DeNardo, LLC  
14000 Commerce Parkway, Suite B  
Mount Laurel, NJ 08054  
(856)793-3080  
Chandra M. Arkema - 029552006  
Krystin M. Kane - 171402015  
Kathleen M. Magoon - 040682010  
Donna L. Skilton - 013072007  
Charles G. Wohlrab - 016592012  
Courtney A. Martin - 098782016  
Jeffrey Rappaport - 003431991

ATTORNEYS FOR WELLS FARGO BANK, N.A.

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IN RE: UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY

ROBERT L. FRANKLIN, DEBTOR

CASE NO.: 17-21641-ABA  
CHAPTER 13

HEARING DATE: JULY 11, 2018

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#### NOTICE OF OBJECTION TO CONFIRMATION

The undersigned, Shapiro & DeNardo, LLC, attorneys for the Secured Creditor, Wells Fargo Bank, N.A., the holder of a Mortgage on Debtor's property located at Wells Fargo Bank, N.A., hereby objects to the Confirmation of the Debtor's proposed Chapter 13 Plan on the following grounds:

1) Debtor's Chapter 13 Plan does not provide for the Secured Creditor to receive distributions with a value equal to the allowed amount of its claims required by 11

U.S.C.1325(a)(5)(B)(ii).

2) Debtor's Proposed Chapter 13 Plan seeks to avoid Secured Creditor's lien encumbering the subject property, 204 East Patcong Avenue, Linwood, New Jersey 08221. Debtor indicates Secured Creditor's claim is to be reduced to \$0.00; based on a collateral value of \$380,000.00.

3) Creditor disputes this valuation and requests additional time to investigate the value of the subject property

WHEREFORE, Wells Fargo Bank, N.A. respectfully requests that the Confirmation of Debtor's Chapter 13 plan be denied and that the Debtor be required to file an Amended Chapter 13 Plan providing for full payment of arrears due to the Secured Creditor.

SHAPIRO & DENARDO, LLC

By: /s/ Charles G. Wohlrab  
Charles G. Wohlrab, Esquire

Dated: 6/29/18

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IN RE:

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY

FRANKLIN L. FRANKLIN, DEBTOR

CASE NO.: 17-21641-ABA  
CHAPTER 13

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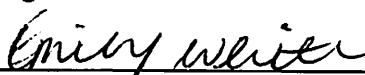
### CERTIFICATION OF SERVICE

I, Emily White

1. ☐ represent the \_\_\_\_\_ in the above-captioned matter.  
  
☒ am the secretary/paralegal for Charles G. Wohlrab, Esquire, who represents the Secured Creditor in the above-captioned matter.  
  
☐ am the \_\_\_\_\_ in the above case and am representing myself.
2. On 06/29/2018, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below:  
  
Notice of Objection to Confirmation of Plan,
3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Signature

Dated: June 29, 2018

  
\_\_\_\_\_  
Emily White

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Bruno Bellucci, III Bellucci Law, P.C. 1201 New Road Suite 138 Linwood, NJ 08221		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
Isabel C. Balboa Chapter 13 Standing Trustee Cherry Tree Corporate Center 535 Route 38 - Suite 580 Cherry Hill, NJ 08002		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
Robert L. Franklin 204 East Patcong Avenue Linwood, NJ 08221		<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)

# **SHAPIRO & DeNARDO, LLC**

ATTORNEYS AT LAW  
A PENNSYLVANIA LIMITED LIABILITY COMPANY

14000 Commerce Parkway, Suite B  
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Tel: (856) 793-3080 Fax: (847) 627-8809

GERALD M. SHAPIRO +++  
DAVID S. KREISMAN \*\*  
CHRISTOPHER A. DeNARDO +

+ Licensed in New Jersey and Pennsylvania  
++ Licensed in New Jersey and New York  
+++ Licensed in Illinois and Florida  
++++ Licensed in New Jersey and Florida  
+++++ Licensed in Rhode Island and New Jersey  
\*+ Licensed in New Jersey, Pennsylvania, Florida  
\* Licensed in New Jersey Only  
\*\* Licensed in Illinois Only  
\*\*\* Licensed in Pennsylvania Only

## NJ Attorneys

CHANDRA M. ARKEMA +  
Managing Partner – NJ  
KATHLEEN M. MAGOON \*  
Supervising Foreclosure Attorney  
KRYSTIN M. KANE+++++  
COURTNEY A. MARTIN\*+  
DONNA L. SKILTON +  
CHARLES G. WOHLRAB +  
JEFFREY RAPPAPORT\*  
GARY M. KANELIS ++  
Of Counsel

June 29, 2018

United States Bankruptcy Court  
Mitchell H. Cohen U.S. Courthouse  
400 Cooper Street  
Camden, NJ 08101

In Re: Robert L. Franklin, Debtor  
Case No: 17-21641-ABA  
Chapter: 13  
Secured Creditor: Wells Fargo Bank, N.A.  
Our file number: 18-023404

Dear Court Clerk:

Enclosed please find Notice of Objection to Confirmation, said Confirmation Hearing presently scheduled before the Court on July 11, 2018 at 9:00 AM.

Thank you for your attention.

Very truly yours,  
Shapiro & DeNardo, LLC

By: /s/ Charles G. Wohlrab  
Charles G. Wohlrab, Esquire

## Enclosures

cc: Bruno Bellucci, III, Debtor's Attorney  
Isabel C. Balboa, Chapter 13 Standing Trustee, Trustee  
Robert L. Franklin, Debtor  
204 East Patcong Avenue  
Linwood, NJ 08221